

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

FEB 24 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
Administration of the
North American Numbering Plan

)
)
) CC Docket No. 92-237
) Phase I
)

REPLY COMMENTS OF TELEPORT COMMUNICATIONS GROUP

Teleport Communications Group Inc. ("TCG") hereby files its Reply Comments in Phase I of the Federal Communications Commission's ("FCC") inquiry into the administration of the North American Numbering Plan ("NANP").

I. A Neutral NANP Administrator is Critical to the Growth of Local Exchange Competition and the Development of New Telecommunications Services.

The fair administration of number resources and associated database and local administrative functions will be a decisive factor in the development of new telecommunications services and the possibility of local exchange competition. It is not reasonable to expect a party with a vested interest in the allocation and administration of number resources to continue to administer number resources in a neutral and disinterested manner in the face of potential competition for local telecommunications services and the development of new telecommunications services.

No. of Copies rec'd
List A B C D E

0+5

For this reason alone, the FCC must begin a process whereby the administration of the NANP is transferred to a neutral party.

Comments received in the instant docket recognize the growing conflict of interest inherent in the current administration of the NANP where Bellcore, an affiliate of the Regional Bell Operating Companies ("RBOC"), sets policy and performs administrative duties for a numbering plan that effects all carriers and users. Commenters suggest a variety of options for eliminating this conflict of interest, but there is a growing consensus that Bellcore should no longer act as the NANP Administrator.¹ Parties suggest, and TCG supports, the appointment of a neutral Administrator for the NANP.

II. A Neutral Administrator Should Be Appointed Now, and Be Prepared to Take Over Administration of the NANP in 1995.

Some parties suggest that the appointment of a new NANP administrator should be delayed until 1995 when interchangeable NXX codes and 4-digit carrier identification codes are implemented.² TCG could support such a delay if the FCC immediately begins the process of appointing a new, neutral Administrator to take over the administration of the NANP by 1995 and immediately appoints an Advisory Council to oversee the current administration of numbering resources.

¹ Parties do not fault Bellcore for their administration, rather, parties have simply concluded that Bellcore's role in the administration of numbering resources should come to an end as its conflict of interest grows.

² See, e.g., GTE Comments at 7 and Comments of Southwestern Bell Corporation at 1.

The transition of administration of the NANP from Bellcore to a neutral Administrator will be a complex process which cannot be completed overnight. By the same token, the fair administration of numbering resources is critical to the possibility of local exchange competition and the development of new telecommunications services, and therefore cannot be delayed unreasonably. In order to ensure a timely, smooth transition of administration, the FCC should establish a transition process to be started immediately and be completed by 1995. The long transition period will allow the new Administrator to assist Bellcore with the introduction of interchangeable NXX codes and 4-digit carrier identification codes, thus offering the new Administrator "on-the-job training" and an opportunity to familiarize itself with the industry participants.

Additionally, the FCC should immediately appoint an Advisory Council that will oversee Bellcore's administration of the NANP to ensure that the current administration of the NANP does not adversely affect the interests of common carriers which have no direct access to or control over numbering resources. This Advisory Council should be comprised of all FCC (and state PUC) certificated local common carriers, as well as current wireless common carriers and PCS experimental license holders. The Advisory Council should participate in all facets of policy development and administration and assist in the transition process.

III. The FCC Should Ensure That LECs Deploy SS7 and AIN Capabilities to Facilitate Local Number Portability.

In order to ensure that local number portability³ is universally available as soon as possible, the FCC (and state PUCs) should require LECs to deploy SS7 and AIN capabilities⁴ in a manner which is conducive to and consistent with the eventual full implementation of local number portability. Local number portability is absolutely essential to the possibility of local exchange competition, and the lack of local number portability will impede the FCC's and state PUC other efforts to encourage such competition.⁵

TCG is troubled by the apparent ambivalence toward this issue reflected in the comments of several of the Regional Bell Operating Companies ("RBOC"). It is clear that many RBOCs have no sense of urgency about the issue of local number portability, and no

³ By local number portability, TCG means the ability of a consumer to retain its telephone number within a number plan area regardless of which service provider the consumer subscribes to.

⁴ SS7 refers to the current protocol of Common Channel Signalling which utilizes a separate data network to establish transmission path connections within a telecommunications network. AIN ("Advanced Intelligent Network") refers to the ability of a carrier to change central office switch instructions from one central location rather than at each individual central office. This arrangement greatly enhances the flexibility and capabilities of a network.

⁵ See, e.g., Expanded Interconnection with Local Telephone Company Facilities, Report and Order in CC Docket 91-141 (October 19, 1992), and Amendment of the Commission's Rules to Establish New Personal Communications Services Tentative Decision and MO&O in GEN Docket 90-314 (November 6, 1992).

incentive to pursue it.⁶ For this reason, TCG urges the FCC (and state PUCs) to monitor the deployment of SS7 and AIN capabilities to ensure that local number portability is available as a normal AIN feature.

IV. Conclusion

Direct access to and control over number resources is essential to the possible development of competition for local telecommunications services and to the deployment of new telecommunications technologies in the local telecommunications networks that make up the critical elements of the national telecommunications infrastructure. Currently, only a select few carriers have such direct access and control. Those carriers who lack "equal access" to numbering resources operate at a severe competitive disadvantage. The public interest is not served by such an unbalanced and unfair situation. Transfer of the administration of the NANP to a neutral Administrator accountable to all local carriers -- wireline and wireless, dominant and non-dominant -- will greatly enhance the prospects for local telecommunications competition and new telecommunications services. For these reasons, TCG urges the FCC to:

1. transfer the administration of the NANP to a neutral Administrator no later than 1995;

⁶ As an affiliate of the RBOCs, Bellcore may have this same ambivalence.

2. immediately appoint an Advisory Council to oversee Bellcore's current administration of the NANP; and
3. ensure that the LECs deploy SS7 and AIN capabilities in a manner conducive to and consistent with local number portability.

Respectfully submitted,

TELEPORT COMMUNICATIONS GROUP

A handwritten signature in black ink, appearing to read "Robert C. Atkinson", written over a horizontal line.

Robert C. Atkinson
Senior Vice President
Regulatory and External Affairs
One Teleport Drive, Suite 301
Staten Island, New York 10311
(718) 983-2160

February 24, 1993